

Exhibit D

From: [Adrian Bacon](#)
To: [Timothy J. Fransen](#)
Cc: [Yoel Hanohov](#); [Robert Sabido](#); [Todd Friedman](#); [Erika Campany](#); "[Joshua Trigsted](#)" (jtrigsted@attorneysforconsumers.com)
Subject: Re: Kramer, Shasta v. Ray Klein Inc.
Date: Thursday, February 08, 2018 3:30:12 PM

We need 180 days. We have to not only find the heir, but finish the execution of the will and eat all the documents necessary for the claim to vest and then move the court for substitution. Then we have to get back to litigating the claim. It's not an overnight process.

Sent from my iPhone

On Feb 8, 2018, at 3:18 PM, Timothy J. Fransen <tfransen@cosgravelaw.com> wrote:

Yoel:

Thank you. We've informed the client representative that the February 12 deposition is off the calendar. As for the deadlines, at this time, we would not object to a 90-day extension of the existing pretrial deadlines.

Thanks,

Timothy J. Fransen - Attorney

Cosgrave Vergeer Kester LLP
500 Pioneer Tower
888 SW Fifth Avenue
Portland, OR 97204

P 503.323.9000 D 503.219.3807
F 503.323.9019 W www.cosgravelaw.com

[Biography](#) | [Email](#) | [LinkedIn](#)

<image001.jpg>

From: Yoel Hanohov [<mailto:Yoel.Hanohov@toddfllaw.com>]
Sent: Thursday, February 8, 2018 2:37 PM
To: Timothy J. Fransen <tfransen@cosgravelaw.com>; Robert Sabido <rsabido@cosgravelaw.com>; Todd Friedman <TFriedman@toddfllaw.com>; Erika Campany <ecampany@toddfllaw.com>
Cc: "Joshua Trigsted" (jtrigsted@attorneysforconsumers.com)' <jtrigsted@attorneysforconsumers.com>; Adrian Bacon <abacon@toddfllaw.com>
Subject: RE: Kramer, Shasta v. Ray Klein Inc.

We'll take the deposition off calendar. We think that 6 months would be appropriate to make sure that we can get approval from the heirs and the Court. Let us know if that works, and we'll send over a stipulation.